REMARKS

Claims 1, 3-17, and 19-24 are pending. Of these, claims 6, 7, 15-17, and 19 have been allowed, claims 1, 3, 4, 8-11, and 13 have been amended, and new claim 24 has been added to recite additional features of the invention. Claims 2 and 18 have been canceled.

Reconsideration of the application is respectfully requested for the following reasons.

In the Office Action, claims 2-5 were indicated to be allowable if re-written into independent form to recite the features of their base and intervening claims. Claim 1 has been amended to recite the features of claim 2, claim 3 has been amended to depend from claim 1, and claim 4 has been re-written into independent form. Applicants respectfully submit that these amendments are sufficient to place claims 1 and 3-5 into condition for allowance.

The Examiner rejected claims 1, 8-14, and 20-23 under 35 §103(a) for being obvious based on a combination of the Sprague and Brusewitz patents. The Examiner also relied on the Kleihorst patent in asserting this combination. Applicants traverse this rejection for the following reasons.

Initially, it is noted that claim 14 depends from claim 15, which has been allowed. Accordingly, it is respectfully submitted that claim 14 should also be allowed.

Claim 8 has been amended to recite that the transmitting step includes the following features: " buffering an encoded bitstream of the moving picture in a channel buffer; storing an encoded bitstream of the still picture in a memory in response to a control signal; and

selecting and transmitting from a multiplexer one of the encoded bitstream of the moving picture from the channel buffer and the encoded bitstream of the still picture from the memory." These features are similar to those recited in allowable claim 2, and therefore it is submitted that claim 8 and its dependent claims are also allowable.

Claim 13 recites a method for transporting a still picture by receiving and storing a still picture at a first resolution, encoding the stored picture at a second resolution, and transmitting the still picture encoded at the second resolution. In addition to these features, claim 13 recites "determining a difference between the stored still frame encoded at the first resolution and the transmitted still frame encoded at the second resolution; encoding said difference and transmitting the encoded difference." The cited references do not teach or suggest these features.

More specifically, the Sprague patent discloses a system for encoding images which may be transmitted over a communication channel. As shown in Figure 3, the Sprague system includes an encoder for encoding an input video image signal, a channel buffer for storing the encoded signal, and a rate controller which changes a quantizing rate in the encoder based on transmission rate information provided by the buffer.

The Sprague patent further discloses that the input image signal may be a still image or one of a plurality of pictures that constitute motion video. (See column 5, lines 44-47.) The Sprague patent, however, does not teach or suggest "determining a **difference** between the stored still frame encoded at the first resolution and the transmitted still frame encoded

at the second resolution; **encoding said difference** and **transmitting the encoded difference**." (Emphasis added). These features are advantageous, for example, because they allow a decoder side to reproduce pictures with increased quality. (See page 17, lines 4-20).

In rejecting claim 13, the Examiner appeared to overlook these features, stating that claim 13 is unpatentable for the same reasons claims 1 and 8 are unpatentable. However, neither claim 1 nor claim 8 recites the determining, encoding, and transmitting steps of claim 13.

To make up for deficiencies of Sprague, the Examiner cited the Brusewitz patent. This patent discloses capturing a still frame from moving picture data, where the still frame has higher resolution than the moving picture data. Brusewitz, however, does not teach or suggest the determining, encoding, and transmitting steps recited in claim 13. And Kleihorst is also deficient in this respect.

For at least the foregoing reasons, it is respectfully submitted that claim 13 and its dependent claims are non-obvious and thus patentable over a Sprague-Brusewitz combination, whether taken alone or in consideration with the Kleihorst patent.

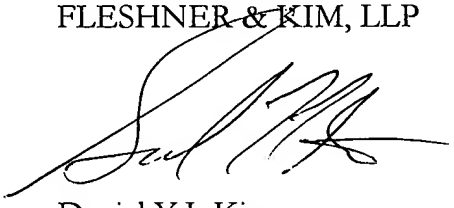
New claim 24 recites "reducing a quantizing value during encoding to control a transmission rate of a channel buffer." (See, e.g., page 17, lines 4-20, for support). These features are not taught or suggested by the cited references. Accordingly, it is submitted that claim 24 is allowable along with the remaining pending claims.

Reconsideration and withdrawal of all the rejections of record is respectfully requested.

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney, Samuel W. Ntiros, at the telephone number listed below. Favorable consideration and prompt allowance are earnestly solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,
FLESHNER & KIM, LLP



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